IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION **Master File No. 2:12-MD-02327**

MDL 2327

THIS DOCUMENT RELATES TO:

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

WAVE 13 CASES LISTED IN EXHIBIT A

NOTICE OF ADOPTION OF PRIOR MOTION TO EXCLUDE SUZANNE PARISIAN, M.D., FOR WAVE 13

For the Wave 13 cases identified in Exhibit A attached hereto, Defendants Ethicon, Inc. and Johnson & Johnson hereby adopt and incorporate by reference the Motion to Exclude Suzanne Parisian, M.D., from Ethicon Wave 4. *See* ECF No. 3592 (Mot.); ECF No. 3594 (Mem. in Support); *see also* ECF No. 3845 (Reply). Defendants respectfully request that the Court exclude Dr. Parisian's testimony for the reasons discussed in the Wave 4 briefing.

Respectfully submitted,

/s/ William M. Gage
William M. Gage (MS Bar No. 8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar No. 5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)

P.O. Box 3824 Charleston, WV 24338 (304) 414-1800 <u>srobinson@tcspllc.com</u>

Counsel for Defendants Ethicon, Inc., and Johnson & Johnson

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
William M. Gage